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Attorneys for Defendants  
HSBC MORTGAGE CORPORATION (USA)  
AND HSBC BANK USA, N.A.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

Philip Wong, Frederic Chaussy, and Leslie  
Marie Shearn, individually, on behalf of all  
others similarly situated, and on behalf of  
the general public,

Plaintiffs,

v.

HSBC Mortgage Corporation (USA);  
HSBC Bank USA, N.A.; and DOES 1  
through 50, inclusive,

Defendants.

Case No. C 07 2446 MMC [ECF]

**DECLARATION OF JEANETTE  
JENNINGS IN SUPPORT OF  
DEFENDANTS' OPPOSITION TO  
PLAINTIFFS' MOTION FOR LEAVE TO  
AMEND FIRST AMENDED COMPLAINT**

Date: August 22, 2008  
Time: 9:00 a.m.  
Courtroom: 7 (19th Floor)  
Judge: Hon. Maxine M. Chesney

Complaint filed: May 7, 2007  
FAC filed: June 29, 2007  
Trial Date: Not Yet Set

1, Jeanette Jennings, hereby declare and state:

1. I have personal knowledge of the facts set forth below. If called as a witness, I could and would testify to the following:

2. I am employed by HSBC Bank USA, N.A. (hereinafter "HBUS"). My corporate title is "Senior Vice President." My functional job title is "Group Director for Human Resources." In my job, I supervise a group of Human Resources professionals. I, along with the individuals I supervise, provide Human Resources services for HSBC Mortgage Corporation (USA) (hereinafter "HMCU").

3. It is HMCU's practice, in conjunction with assistance from the Human Resources group providing Human Resources services for HMCU, to provide all individuals participating in an HMCU sales incentive plan with a copy of that incentive plan. For example, I am aware that Plaintiffs Wong and Chaussy received copies of incentive plans applicable to their jobs.

4. The Human Resources professionals that I supervise have responsibility for inputting personnel related information and/or processing instructions related to personnel changes during or at the end of an individual's employment with HMCU. Much of the personnel information that is maintained for these individuals is kept in our PeopleSoft system. I have reviewed the PeopleSoft records for proposed named plaintiff Karen Flanagan. The records reflect that Ms. Flanagan's employment with HMCU ended on March 30, 2007.

I declare under penalty of perjury under the laws of the States of California and New York and the United States of America that the foregoing declaration is true and correct to the best of my personal knowledge. Executed this 1st day of August 2008, in Depew, New York.

  
JEANETTE JENNINGS

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